

Lee, Bert E.

From: Heintz, James M.
Sent: Thursday, June 25, 2020 5:47 PM
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Subject: IPR2020-00459

Counsel:

Petitioners stipulate that, if the IPR is instituted on the grounds presented in the IPR2020-00459 Petition (i.e., Hsu + Mozdzyn as applied to claims 1-4, 6-11, and 13-15; Hsu + Philipp as applied to claims 1-4, 6-11, and 13-15; Hsu + Chang as applied to claims 1-3, 7-10, and 14-15; and Hsu + Chang + Frey as applied to claims 4, 6, 11, and 13), then Petitioners will not pursue these same grounds in the parallel WDTex and NDCal district court litigations.

Regards,

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